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Attorneys for Plaintiffs AMAZON.COM, INC.  
 and AMAZON TECHNOLOGIES, INC.

UNITED STATES DISTRICT COURT

NORTHERN DISTRICT OF CALIFORNIA

AMAZON.COM, INC., a Delaware  
 corporation, and AMAZON TECHNOLOGIES,  
 INC., a Nevada corporation,

Plaintiffs,

v.

UMER WASIM, *et al.*,

Defendants.

Case No. 3:23-cv-05580-TLT

**DECLARATION OF COURTNEY SAKRE  
 IN SUPPORT OF PLAINTIFFS  
 AMAZON.COM, INC. & AMAZON  
 TECHNOLOGIES, INC.'S MOTION FOR  
 DEFAULT JUDGMENT AGAINST  
 DEFENDANTS (1) VTLOGODESIGN,  
 INC.; (2) MK AFFILIATES, INC.; (3) ALI  
 ALAM; (4) DYNAMIC DIGITAL  
 SOLUTIONS LLC; (6) MEHWASH  
 MUNIR; (6) ONE STOP COMPUTER  
 SERVICES LLC; (7) MUHAMMAD  
 ZUBAIR KHAN; (8) TECHTURE INC.; (9)  
 MUHAMMAD MUDASSAR ANWAR; (10)  
 TECH DRIVE PVT LLC; (11) ASHHAR  
 RAWOOF; (12) SMART STARTUP  
 SOLUTIONS; (13) MUHAMMAD USMAN  
 KHAN; (14) YASIR AGAR; (15)  
 MUHAMMAD SHIRAZ QURESHI; AND  
 (16) MAVIA NIZAM**

**Hearing Date: December 10, 2024**  
**Time: 2:00 pm**  
**Location: San Francisco**  
**Courtroom 09, 19th Flr**  
 Complaint filed: October 30, 2023

1 I, Courtney Sakre, declare as follows:

2 1. I am over the age of eighteen and am competent to testify as to the matters set forth  
3 herein. I have personal knowledge of the facts in this Declaration, and base this Declaration on  
4 my personal knowledge.

5 2. I make this Declaration in support of Plaintiffs' Motion for Default Judgment  
6 Pursuant to Federal Rule of Civil Procedure 55(b) as to Defendants: (1) VTLogodesign, Inc.; (2)  
7 MK Affiliates, Inc.; (3) Ali Alam; (4) Dynamic Digital Solutions LLC; (5) Mehwash Munir; (6)  
8 One Stop Computer Services LLC; (7) Muhammad Zubair Khan; (8) Techtute Inc.;  
9 (9) Muhammad Mudassar Anwar; (10) Tech Drive Pvt LLC; (11) Ashhar Rawoof; (12) Smart  
10 Startup Solutions, LLC.; (13) Muhammad Usman Khan; (14) Yasir Agar; (15) Muhammad Shiraz  
11 Qureshi; and (16) Mavia Nizam ("Defendants"). The following facts are personally known by me  
12 to be true and, if called and sworn as a witness, I could and would competently testify as follows.

13 3. I am the Director of Risk and Operations for Books at Amazon and have worked in  
14 this role since 2023, and at Amazon since 2013.

15 4. Amazon offers the Kindle Direct Publishing ("KDP") service, which allows  
16 authors to self-publish books in print and digital formats for free and reach millions of readers in  
17 over a dozen Amazon marketplaces and 175 countries.

18 5. KDP has helped millions of authors reach new readers and pursue careers in self-  
19 publishing. KDP self-published authors have won numerous awards, including the Romance  
20 Writers of America RITA Award, the highest award of distinction in romance fiction.

21 6. In October 2023, more than 269,000 people followed Amazon's KDP Facebook  
22 page and more than 78,800 people followed Amazon's KDP X (formerly known as Twitter)  
23 account.

24 7. KDP authors control the rights to their books and can make changes to their books  
25 at any time. Authors can set up an eBook for publication within minutes, and within 72 hours the  
26 eBook can appear for sale on Amazon. When publishing, authors select a royalty plan which  
27 determines what percentage of the amounts earned from sales are paid to the author.  
28

I declare under penalty of perjury under laws of the United States that the foregoing is true and correct. Executed this 12<sup>th</sup> day of September, 2024 in Charleston, South Carolina.

Signed by: Courtney Sakre  
E9A1596EAB53471...

# EXHIBIT A

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